

William Banks  
Foamex, L.P.  
3005 Commercial Road  
Fort Wayne, Indiana 46809

Re: 003-12178-00225  
Minor Source Modification to:  
Part 70 permit No.: T003-7680-00225

Dear Mr. Banks:

Foamex, L.P. was issued Part 70 operating permit T003-7680-00225 on March 22, 1999 for a stationary plant that manufactures polyurethane foam. An application to modify the source was received on April 17, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) Increase the foam processing rate of the existing one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year; and
- (b) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).

The following construction conditions are applicable to the proposed project:

General Construction Conditions

- 1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
- 2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
- 6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be

placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

APD

cc: File - Allen County  
U.S. EPA, Region V  
Allen County Health Department  
Air Compliance Section Inspector - Jennifer Schick  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Foamex, L.P.  
3005 Commercial Road  
Fort Wayne, Indiana 46809**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 003-12178-00225	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION D.6 FACILITY OPERATION CONDITIONS

- (a) Increase the foam processing rate of the existing one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year; and
- (b) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Volatile Organic Compounds (VOCs)

Any change or modification which may increase the potential to emit VOC, PM and PM10 greater than exempt levels, as specified in 326 IAC 2-1, based on the stack test results, shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

#### D.6.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emissions from the following felt presses shall be limited as follows:

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Felt Press C (ID: FPC)	0.71	3.25
Felt Press D (ID: FPD),	0.71	3.25

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirement

#### D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee shall perform PM, PM10 and VOC testing, to verify the PM, PM10 and VOC emissions from these facilities, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, and methods as approved by the Commissioner for VOC. The testing schedule shall follow the schedule in the issued Part 70 permit T003-7680-00225.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.6.4 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with (1) through (4) below for the thermal reticulation unit. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.6.1.

- (1) The number of polyurethane sheets processed;
  - (2) The weight of the polyurethane foam processed;
  - (3) A log of the dates of use; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Minor Source Modification

#### Source Background and Description

Source Name:	Foamex, L.P.
Source Location:	3005 Commercial Road
County:	Allen
SIC Code:	3086
Operation Permit No.:	T 003-7680-00225
Operation Permit Issuance Date:	March 22, 1999
Minor Source Modification No.:	003-12178-00225
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a modification application from Foamex, L.P. relating to the following equipment used in the polyurethane foam production:

- (a) Increase the foam processing rate of the existing one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year; and
- (b) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).

#### History

On April 17, 2000, Foamex, L.P. submitted an application to the OAM requesting to modify the existing felt press (ID No. FPC) and the installation of one new felt press. Foamex, L.P. was issued a Part 70 permit (T003-7680-00225) on March 22, 1999.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
48	Existing six-sheet Felt Press (ID: FPC)	20	24" x 36"	5,000	120
49	Proposed six- sheet Felt Press (ID: FPD)	20	24" x 36"	5,000	120

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 17, 2000. Additional information was received via e-mail on April 26, 2000.

### Emission Calculations

(a) Felt Presses Emissions:

The VOC and PM/PM10 emission factors were established from the 1995 stack test of a like kind source at the Foamex Eddiestone plant. The result of this stack test was utilized in the issuance of the Part 70 permit (T003-7680-00225) of this plant, Foamex, L.P., 3005 Commercial Road, Fort Wayne, Indiana 46809. Also, the results of the stack test are used in the proposed source modification corrected for the increased production rate.

Facility	Throughput (sheets/year)	VOC Emission Factor, Ef (lb/sheet)	VOC Emission (Tons/year)	PM/PM10 Emission Factor, Ef (lb/sheet)	PM/PM10 Emissions (Tons/year)
Felt Press C (FPC)	300,000	0.041	6.2	$13.5 \times 10^{-4}$	0.20
Felt Press D (FPD)	300,000	0.041	6.2	$13.5 \times 10^{-4}$	0.20
TOTAL			12.4		0.40

### Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.40
PM-10	0.40
SO <sub>2</sub>	0.0
VOC	12.4
CO	0.0
NO <sub>x</sub>	0.0

### Justification for Level of Approval

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d), since VOC is emitted at levels greater than ten (10) tons per year, but less than twenty-five (25) tons per year.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD Definition (came from the **Limited Potential to Emit Table** of the Technical Support Document of the issued Part 70 Permit):

Pollutant	Emissions (tons/year)
PM	15.1
PM-10	15.0
SO <sub>2</sub>	56.0
VOC	210.5
CO	93.2
NO <sub>x</sub>	27.6

- (a) The existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after



issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Modified Existing Felt Press, FPC	0.20	0.20	0.0	6.2	0.0	0.0	0.0
Proposed Felt Press, FPD	0.20	0.20	0.0	6.2	0.0	0.0	0.0
TOTAL	0.40	0.40	0.0	12.4	0.0	0.0	0.0

This modification to an existing minor stationary source is not major because the emission increase is less than the 250 tons per year, PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):  
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):  
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

#### State Rule Applicability - Sourcewide

- (a) 326 IAC 2-6 (Emission Reporting)  
This rule is applicable to the source, since it is a Title V source, with Potential to Emit VOC at a rate greater than 100 tons per year. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).
- (b) 326 IAC 5-1 (Visible Emissions Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) 326 IAC 6-4 (Fugitive Dust Emissions)  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

### State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)  
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not regulated by other provisions of this article, 326 IAC 8.

The existing modified Felt Press C (ID: FPC) and the proposed Felt Press D (ID: FPD) are not subject to 326 IAC 8-1-6, because the potential VOC emissions from each press is less than 25 tons per year.

- (b) 326 IAC 6-3-2 (Process Operations)  
This rule mandates a PM emission limits for the Felt Press C (ID: FPC) and the proposed Felt Press D (ID: FPD), using the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Felt Press C (ID: FPC)	0.71	3.25
Felt Press D (ID: FPD),	0.71	3.25

The two felt presses are in compliance with the rule, because their potential uncontrolled emissions are well below the PM limits.

### Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 **Minor Source Modification No. 003-12178-00225**.